

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

NOV 05 2014

DAVID J. MALAND, CLERK  
BY  
DEPUTY \_\_\_\_\_

UNITED STATES OF AMERICA

§  
§  
§  
§  
§

v.

AARON DOUGLAS LAKEY

NO. 1:14-CR- 112  
Honorable Judge Clark-Hawthorn

**INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

**Count One**

Violation: 18 U.S.C. § 2422(b) (Enticement  
of a Minor)

Beginning on or about August 23, 2014 and continuing until on or about September 26, 2014, in the Eastern District of Texas, and elsewhere, **Aaron Douglas Lakey**, defendant, did use any facility of interstate and foreign commerce, to wit, the Internet and a cellular telephone, to knowingly persuade, induce, entice and coerce any individual, namely Jane Doe, whose identity is known to the Grand Jury, who had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense, including, Texas Penal Code § 22.011(a)(2) (Sexual Assault).

In violation of 18 U.S.C. § 2422(b).

**NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE**

Criminal Forfeiture Pursuant to 18 U.S.C. § 2428 Upon conviction of one or more of the offenses, alleged in Counts One through Four of this indictment, **Aaron Douglas**

**Lakey**, defendant, shall forfeit to the United States pursuant to 18 U.S.C. § 2428, and all property, real and personal, used or intended to be used to commit or to promote the commission of the offense, specifically:

(a) One (1) Verizon Samsung Galaxy S Model H-1500 V cellular telephone;  
and,

(b) One (1) 2004 Ford F-250 Pickup Truck, bearing Vehicle Identification Number (VIN) 1FTNW21P64EB89144.

Moreover, if any property subject to forfeiture, as a result of any act or omission by the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

the defendant shall forfeit to the United States any other property of the defendant up to the value of the forfeitable property.

A TRUE BILL

CAS  
GRAND JURY FOREPERSON

JOHN M. BALES

UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "Randall L. Fluke", written over a horizontal line.

RANDALL L. FLUKE  
ASSISTANT UNITED STATES ATTORNEY

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**NOTICE OF PENALTY**

**Count One**

Violation: 18 U.S.C. § 2422(b) (Enticement of a Minor)

Penalty: Imprisonment of not less than ten (10) years, but up to Life, a fine not to exceed \$250,000.00, or both. A term of supervised release of not less than five (5) years, but up to Life may be imposed.

Special Assessment: \$100.00